



September 9, 2005

ARTHUR BRANCH
280 South Arthur
P. O. Box 1689
Pocatello, ID 83204-1689

(208) 232-5373 Phone
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FLANDRO BRANCH
2000 Flandro Drive
P. O. Box 2028
Pocatello, ID 83206-2028

(208) 238-8378 Phone
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IDAHO FALLS BRANCH
2797 South 25th East
Ammon, ID 83406

(208) 528-2329 Phone
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REXBURG LOAN OFFICE
220 East 2nd North, Suite 5
Rexburg, ID 83440

(208) 356-5377 Phone
(208) 356-5395 Fax

www.ccb-idaho.com

Mr. John F. Carter, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street @ Ecker Square
Suite 2300
San Francisco, CA 94105

Dear Mr. Carter:

We are writing to you as concerned Community Bankers to oppose Wal-Mart's application for an industrial bank charter.

We feel that Wal-Mart's application should be denied as it poses a threat to small community banks, consumers and small businesses. Although Wal-Mart has claimed it will perform limited transactions such as credit card, debit card and electronic check transactions from its retail location, they have not denied that they will pursue full retail banking in the future.

Historically, Wal-Mart has entered local communities and forced small businesses such as grocery stores, hardware stores and clothing stores out of business. This should not be allowed to happen to the banking industry. When community banks such as Citizens Community Bank and other small competitor banks are forced to close, it reduced the number of options consumers have to secure loans or open deposit accounts. Local banks would not be able to compete with Wal-Mart just as local retailers cannot compete now.

At present, the Federal Reserve, as well as the FDIC heavily regulates community banks. Regulation of a Wal-Mart bank becomes an issue, as the Federal Reserve could not regulate them. Not only would banks have to deal with a Wal-Mart bank, but the credit union issues could arise again as well.

For these reasons, we urge the FDIC to reject Wal-Mart's application for an industrial bank charter.

Sincerely,

Ralph G. Cottle
President/CEO



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Sincerely,

Amy Kawahara-Rhoads
Senior Vice President & Branch Administrator



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Sincerely,

Shelley Smith
Project Specialist



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Sincerely,

Martin D. Doncouse
Senior Vice President & Real Estate Manager

Citizens Community Bank

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2005 SEP 12 AM 10:33

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Sincerely,



Daniel C Heiner
Senior Vice President & Sr. Commercial Lender



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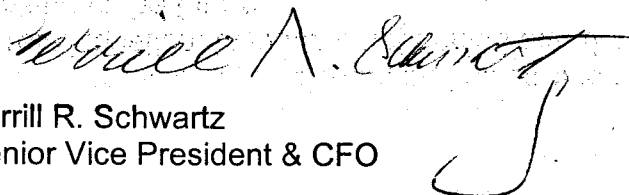
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Sincerely,



Terrill R. Schwartz
Senior Vice President & CFO



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Kristie Olsen
Compliance & Security Officer